

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: James W. Tipton III	:	
Debtor	:	Chapter 13
	:	
	:	Case No: 16-02432 MDF
JPMorgan Chase Bank, N.A.	:	
Movant	:	
v.	:	Answer to Motion for Relief
	:	
James W. Tipton III	:	Relating to Docket # 20
Debtor	:	
	:	
Charles J. DeHart, III, Standing Trustee	:	

ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY

AND NOW, comes the Debtor, James W. Tipton III, by and through his attorney, Timothy L. Czekaj and Scaringi & Scaringi, P.C., and files this answer to the Motion for Relief from Stay and avers as follows:

1. ADMITTED.
2. ADMITTED.
3. DENIED. Strict proof of this allegation is demanded at time of trial.
4. DENIED. Strict proof of this allegation is demanded at time of trial.
5. DENIED. Strict proof of this allegation is demanded at time of trial.
6. DENIED. Strict proof of this allegation is demanded at time of trial.
7. DENIED. Strict proof of this allegation is demanded at time of trial.
8. DENIED. Strict proof of this allegation is demanded at time of trial.

WHEREFORE, the Debtor herein, respectfully prays that this Honorable Court deny the Motion for Relief from the Automatic Stay.

Respectfully Submitted:

Date: November 1, 2016

/s/ Timothy L. Czekaj
Timothy L. Czekaj, Esq.
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Attorney for Debtor

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CERTIFICATE OF SERVICE

I, Ann Aumiller, Paralegal for Scaringi & Scaringi, P.C., do hereby certify that I have served to the parties listed below, a copy of the Debtors Answer to Motion for Relief from the Automatic Stay. Service was accomplished by placing the same in the United States Mail, first class, postage prepaid and addressed as follows on the following:

James W. Tipton III
302 Westminster Avenue
Hanover, PA 17331

Service was accomplished via ECF on the following:

Charles J. DeHart, III Esq.
Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Joshua I. Goldman, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532

Office of US Trustee
833 Chestnut Street, Suite 500
Philadelphia, PA 19107

DATE: November 1, 2016

/s/ Ann Aumiller
Paralegal